

IN THE UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF LOUISIANA

STATE OF MISSOURI, *et al.*,

Plaintiffs,

v.

JOSEPH R. BIDEN, JR., in his official capacity as
President of the United States of America, *et al.*,

Defendants.

No. 22-cv-1213

Consolidated with No. 23-cv-381

Judge Terry A. Doughty
Mag. Judge Kayla D. McClusky

**DEFENDANTS' UNOPPOSED MOTION FOR EXTENSION OF TIME TO RESPOND
TO PROPOSED JURISDICTIONAL DISCOVERY PLAN**

Defendants respectfully request a one-week extension of the due date for their response to Plaintiffs' Proposed Jurisdictional Discovery Plan (Dkt. 408). Plaintiffs do not oppose this motion.

The proposed extension of the due date, to December 13, 2024, is supported by good cause. After the Supreme Court decided *Murthy v. Missouri*, 603 U.S. 43 (2024), this Court on November 8, 2024 ordered Plaintiffs to file the proposed jurisdictional discovery to be taken and a proposed schedule within 14 days of that order (Dkt. 404). Plaintiffs then filed their Proposed Jurisdictional Discovery Plan on November 22, 2024.

Defendants' response to that plan is currently due on December 6, 2024. Defendants require additional time to prepare their response to the Proposed Jurisdictional Discovery Plan given the need to coordinate the response among the numerous agency Defendants and given the limitations on the personnel availability resulting from the Thanksgiving holiday on November 28, 2024.

Plaintiffs do not oppose the requested one-week extension of the due date for Defendants' response to December 13, 2024. A proposed order is attached.

Dated: November 26, 2024

Respectfully submitted,

BRIAN M. BOYNTON
Principal Deputy Assistant Attorney General

JOSHUA E. GARDNER
Special Counsel, Federal Programs Branch

JOSEPH E. BORSON
Assistant Director, Federal Programs Branch

/s/ Indraneel Sur
INDRANEEL SUR (D.C. Bar No. 978017)
Senior Counsel
ALEXANDER W. RESAR (N.Y. Bar No. 5636337)
CATHERINE M. YANG (N.Y. Bar No. 5319736)
Trial Attorneys
U.S. Department of Justice
Civil Division, Federal Programs Branch
1100 L Street, NW, Washington D.C. 20005
Tel: (202) 616-8488
indraneel.sur@usdoj.gov

Attorneys for Defendants

CERTIFICATE OF CONFERENCE

In accordance with the Local Rules of this Court, counsel for Defendants contacted Plaintiffs' counsel to request consent for the filing and granting of this motion. Plaintiffs' counsel informed counsel for Defendants that Plaintiffs do not oppose this motion.

/s/ Indraneel Sur